

To:

NSW Department of Planning, Housing and Infrastructure
Homes NSW SSD Team

Re: SSD-83256472 – 68–80 Banks Avenue, Pagewood

Submission from local resident – 62 Banks Avenue (approx. 110 m from site)

Dear Sir/Madam,

I am the owner-occupier of **62 Banks Avenue, Pagewood**, approximately **110 metres** south of the subject site. My family, including our two young children, has recently completed **internal value-add upgrades** to our home and we intend to remain in the area long term.

I am writing regarding the State Significant Development application for **68–80 Banks Avenue, Pagewood**.

1. Overall position

In principle, I **support**:

- Renewal and upgrade of the existing social housing on this site; and
- Additional well-designed private housing in a location that is walkable to **Eastgardens, Jellicoe Park** and the **golf course**.

The existing estate is clearly ageing and under-utilises a strategic site. Done well, this project can:

- Improve housing quality for existing social tenants;
- Contribute to housing supply in a sensible location; and
- Lift the standard of built form, safety and landscaping along this part of Banks Avenue and Jellicoe Park.

My submission is therefore **not** an objection to redevelopment or to social housing. It is a request that, if consent is granted, it is framed with **specific, enforceable conditions** so that the benefits are realised and the impacts on local amenity, safety and character are properly managed over the long term.

2. Context: the western park and “better side of the golf course”

The EIS and supporting material show that:

- The proposal has been through State Design Review;
- Built form generally aligns with the strategic planning framework (including Housing SEPP bonuses); and
- Considerable work has been done on massing, tree retention, deep soil and communal open space.

At the same time, it is important to recognise the **local context**:

- The **eastern side** of the golf course, towards Eastgardens, is already characterised by larger-scale residential, major retail and higher traffic volumes.
- The **western side** – Jellicoe Park and Banks Avenue – has until now been dominated by **low-rise detached housing and strong landscape character**, with Jellicoe functioning as a local, family-oriented park.

Eight-storey buildings on the Banks Avenue frontage are therefore a **step change** on this side of the course, even if they comply with the broader strategic settings.

I ask that the consent authority:

- Explicitly acknowledge this local context; and
- Use conditions to **lock in the exhibited design quality** (materials, articulation, tree retention, deep soil, canopy and landscape) so that this development becomes a high-quality park and golf-course edge over time, not a value-engineered wall.

3. Traffic, parking and public transport

3.1 Local traffic and parking

I accept the broad order of magnitude of the Transport Impact Assessment, which suggests a **modest increase in vehicle trips** relative to network capacity at the Banks Avenue / Heffron Road intersection.

My concerns are more **street-level**:

- Banks Avenue already experiences noticeable peaks linked to **school runs, Jellicoe Park sport and commuter traffic**, and is heavily used by **families with young children walking and cycling** to the park and to nearby schools.
- It is heavily used by **families walking and cycling** to the park and to nearby schools.
- The cumulative effect of this project and other growth in the **Pagewood–Eastgardens corridor** will be felt most acutely in these local peaks, even if formal intersection performance remains within acceptable levels.

Requested conditions:

1. Post-occupation traffic and parking review

Within 12–24 months of full occupation, require:

- Traffic counts on Banks Avenue and Park Parade;
 - A parking survey of surrounding streets; and
 - A review against agreed thresholds.
2. If thresholds are exceeded, the consent should allow Council to require **mitigation measures** funded or delivered by the proponent, such as local traffic calming, pedestrian crossings, or parking controls.

3. Construction Traffic Management Plan (CTMP)

The CTMP should be prepared in consultation with Council and:

- Prohibit construction vehicle queuing on Banks Avenue and Park Parade;
- Avoid heavy-vehicle movements at peak **school and sport** times where feasible; and
- Include a clear complaints pathway for residents, with response timeframes.

3.2 Public transport – under-examined but critical

The TIA classifies the development as “low impact” in transport terms and concludes that additional public transport demand can be comfortably accommodated, relying primarily on **theoretical bus frequencies**.

From a local user’s perspective:

- Some peak-period services on the **392 corridor** already operate with a high proportion of standing passengers by the time they reach the **Bunnerong Road / Eastgardens** vicinity;
- Marginal additional load is therefore more meaningful than it may appear in simple per-bus averages; and
- The TIA does not present **observed patronage data** or a corridor-level assessment for these services.

I am not asserting that the network is already failing, but I do consider the impact on bus capacity and reliability to be **under-examined**.

Given the scale of development already approved or proposed between **Kingsford, Pagewood and Eastgardens**, I also encourage DPIE and Transport for NSW to consider this precinct within the long-term planning for a **higher-capacity transit solution** (for example, a future extension of the CBD & South East Light Rail along the Anzac Parade / Bunnerong Road corridor, or an equivalent mass-transit upgrade), rather than relying indefinitely on incremental bus improvements alone.

Requested conditions:

3. Public transport monitoring and review

- Require post-occupation monitoring of public transport usage at the stops serving the development (boardings, load factors, pass-bys).
- Establish a formal mechanism for **Transport for NSW** to review and, if necessary, adjust service frequency or timetabling on affected routes if agreed crowding or reliability thresholds are exceeded.

4. Active travel support

- Ensure delivery of the proposed **walk and cycle connections**, wayfinding and bicycle parking as part of the project, to support mode shift away from private cars and ease pressure on local roads and buses.

4. Servicing, waste and deliveries on Banks Avenue

The EIS concludes that a **service lay-by on Banks Avenue** is the preferred servicing solution, after considering and rejecting:

- Park Parade servicing;

- An on-grade loading dock; and
- Basement loading.

I acknowledge the site constraints that led to this choice. However, Banks Avenue is:

- A **fine-grain residential street**; and
- A key pedestrian and cyclist route to **Jellicoe Park**.

Without strong conditions, day-to-day servicing has the potential to erode local amenity and safety.

Requested conditions:

5. Operational limits

- Set defined hours for garbage collection and larger deliveries to minimise noise and disturbance at sensitive times (early mornings, evenings, weekends).
- Restrict the **size, frequency and type** of service vehicles.
- Prohibit reversing alarms or similar high-noise operations in sensitive periods where reasonably practicable.

6. No queuing or standing

- Prohibit truck queuing or standing on Banks Avenue outside the lay-by.
- Include clear enforcement mechanisms if recurrent queuing occurs.

7. Pedestrian priority and safety

- Design the lay-by to clearly prioritise pedestrians, with appropriate **kerb extensions, paving, sightlines and lighting**.
- Integrate the design with paths to Jellicoe Park so that park users and children remain safe around truck movements.

8. Post-occupation servicing review

- Require a review of servicing operations after 12–24 months, with the capacity for Council to impose further mitigation (e.g. modified hours, additional traffic calming) if issues are identified.

5. Construction impacts

Given the scale of excavation and staging, construction will be lengthy and disruptive if not carefully managed.

I support the requirement for both a CEMP and CTMP and request that conditions ensure they:

- Identify nearby residences (including the detached houses south of the site along Banks Avenue, many with **young children**) and **Jellicoe Park users** as specific sensitive receivers for **noise, vibration and dust**;
- Include clear **noise and vibration limits**, monitoring procedures and mitigation triggers;
- Set working hours consistent with relevant guidelines, with stricter controls for the loudest activities;
- Detail how retained trees and park edges will be physically protected; and
- Provide **transparent communication**:
 - A dedicated project contact (phone and email) for residents; and
 - Regular, proactive updates prior to major construction milestones or changes in access/parking.

6. Heritage, landscape and Jellicoe Park interface

The heritage and design material recognises the significance of **Jellicoe Park** and the broader Dacey Garden Suburb context. The proposed increased deep soil, communal open space and tree retention are positive.

To ensure the park and street character are maintained and enhanced over time, I request:

9. Design integrity / excellence conditions

- Secure key attributes of the exhibited design (materials, colours, façade articulation, communal spaces, tree retention and canopy targets) through design integrity or design excellence conditions, not just broad qualitative statements.

10. Park-edge design

- Condition the treatment of the interface with Jellicoe Park to:
 - Avoid high, visually harsh fencing or walls;
 - Maintain passive surveillance while preserving a **green, open edge**; and
 - Ensure lighting supports safety without excessive glare into nearby dwellings or the park.

11. “No worse” built form changes

- Any future modification that alters height, setbacks or envelope should be subject to a clear “no worse” test for **overshadowing, visual bulk and park character** compared with what is now exhibited.

7. Social housing management and mixed tenure

I explicitly **support**:

- Retaining and upgrading social housing on this site; and
- Increasing the total number of social dwellings alongside a significant number of private apartments.

This is a positive step away from an ageing, mono-tenure estate.

However, long-term outcomes depend heavily on **management**, not just the buildings.

Requested conditions:

12. Estate management

- Require an **Estate Management Plan** for the social housing component, covering:
 - On-site or locally accessible management presence;
 - Protocols for dealing with antisocial behaviour, noise, parking and rubbish; and

- Communication channels for neighbours and residents to raise concerns.

13. Shared governance

- Strongly encourage governance arrangements that promote **co-ordinated management** between the social housing and private strata (rather than fragmented arrangements), particularly for shared spaces, servicing and the interface with the public domain.

14. Social infrastructure and cumulative impacts

- Ensure that relevant development contributions are made; and
- Consider this project together with Eastgardens and other nearby developments when planning future social and community infrastructure (schools, childcare, open space, health services) for the area.

8. Conclusion

To summarise:

- I **support** the renewal and expansion of social housing and the addition of private apartments at 68–80 Banks Avenue.
- I accept that the strategic planning case is strong and that the EIS is generally comprehensive.
- My key concerns relate to **how** the project is implemented and operated: local traffic and parking, public transport at peak times, servicing on Banks Avenue, construction impacts, and long-term management of the mixed-tenure estate and its interface with Jellicoe Park.

If consent is granted, I respectfully request that it be accompanied by **robust, specific conditions** along the lines set out above. This will help ensure that:

- The project delivers on its housing and renewal objectives; and
- The amenity, safety and character of Banks Avenue, Jellicoe Park and the “better side of the golf course” are protected and enhanced over time.

Thank you for considering my submission.

Yours faithfully,

Ilan Agranat

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